

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

WILLIAM NORKUNAS, Individually,

Plaintiff,

vs.

SHRI HARI HOSPITALITY, LLC,

Defendant.

Case No. 3:11-cv-00284

JUDGE KEVIN H. SHARP

MAGISTRATE JULIET E. GRIFFIN

JOINT INITIAL CASE MANAGEMENT PLAN AND ORDER

Pursuant to Fed. R. Civ. P. 16 and 26(f), the parties submit the following joint statement:

1. **Matters Discussed by Parties.** The parties discussed the following issues:
 - a. A proposed pre-trial schedule for the case that includes the plan for discovery and deadlines;
 - b. Anticipated dispositive and pre-trial motions;
 - c. Alternative dispute resolution; and
 - d. Settlement.
2. **Procedural Motions and other Pending Matters.** There are no pending motions currently before the Court.

3. **Schedule for Discovery.** The parties have agreed on the following case schedule:

| <u>Event</u> | <u>Agreed Deadline</u> |
|--|---|
| Fed.R.Civ.P. 26(a)(A)-(D) disclosures | August 12, 2011 with supplements taken as necessary |
| Plaintiff's expert reports (Fed.R.Civ.P. 26(a)(2)) | October 15, 2011 October 17, 2011 <i>jo</i> |
| Motions to add parties or amend pleadings | October 21, 2011 |
| Defendant's expert reports (Fed.R.Civ.P. 26(a)(2)) | January 13, 2012 |
| Close of discovery (except expert discovery) | February 1, 2012 |
| Summary judgment motions must be filed by | February 29, 2012 |
| Close of expert discovery | February 29, 2012 |

4. **Discovery Limits.** The parties have agreed that all discovery requests must be propounded no later than 33 days prior to the close of discovery. Each party shall reserve its or his right to seek by motion additional discovery, with good cause shown.

5. **Settlement.** The parties have agreed that settlement is likely, but do not at this time request a settlement conference before a Magistrate Judge.

6. **Trial by Magistrate Judge.** The parties consent to trial by a Magistrate Judge.

7. **Modification of Schedule.** All dates set forth herein may be modified by written agreement of the parties and approval of the Court, or upon motion of the Court for good cause shown.

Respectfully submitted,

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SO ORDERED, this _____ day of _____, 2011, in Nashville, Tennessee.


UNITED STATES MAGISTRATE JUDGE
JULIET E. GRIFFIN